

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-80219-CANNON

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
MICHAEL GORDON DOULGAS, )  
a/k/a "DaddyBreendsFam," )  
a/k/a "Michael," )  
 )  
Defendant. )  
\_\_\_\_\_ )

**GOVERNMENT'S FIFTH RESPONSE TO  
THE STANDING DISCOVERY ORDER**

The United States hereby files this fifth response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

- A. 5. Books, papers, documents, data, photographs, tangible objects, buildings or places, within the government's possession, custody or control, which are material to the preparation of the defendant's defense, or which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected at a mutually convenient time at: the Office of the United States Attorney, 500 A. Australian Ave., West Palm Beach, Florida, Suite 400. Please call the undersigned within 48 hours if you intent to review the evidence to set up a date and time that is convenient to both parties.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, data, etc., that the government may intend to introduce at trial.

- B. DEMAND FOR RECIPROCAL DISCOVERY: Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

The attachments to this response have been uploaded to USAfX in a folder entitled, “Douglas Discovery, RSOD 5”, and made available via secured link to defense counsel identified below, and includes one (1) .PDF file entitled, “US v. Douglas, 23CR80219-CANNON, RSDO5, Bates Numbers 01258 - 01825.pdf; one (1) .mp4 file entitled, “DOUGLAS UC call 12-12-23\_with captions”, a folder entitled “Douglas Jail Calls” containing the three (3) subfolders and files indicated below, and a folder entitled: “Douglas Videos with Transcription Imposed” containing the six (6) previously produced .MP4 video files sent from the Defendant with the transcription of the words imposed on the video.

Name	Size
DOUGLAS UC call 12-12-23_with captions.mp4	46171K
US v. Douglas, 23CR80219-CANNON, RSDO4, Bates Numbers 01258 - 01825.pdf	3000K

***Douglas Jail Calls***

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1719952501_325_12_73_525.wav	740K
1719965222_314_12_153_884.wav	410K
1719972140_324_12_193_41.wav	1482K
1720027315_324_12_162_725.wav	1447K
1720030586_324_13_160_812.wav	1652K
1720031433_324_13_158_132.wav	1552K
1720035910_314_13_71_751.wav	646K
1720039478_324_12_199_185.wav	255K
1720056727_314_12_180_441.wav	2191K
1720061115_324_13_129_929.wav	683K
1720102808_324_13_68_709.wav	1205K
1720114168_315_12_165_656.wav	310K
1720125087_323_12_157_523.wav	865K
1720137625_314_12_159_163.wav	1072K
1720146176_324_12_178_684.wav	1439K
1720200867_324_12_186_403.wav	1802K
1720209346_314_12_180_660.wav	2343K
1720211415_324_12_159_82.wav	521K
1720224038_314_13_171_8.wav	769K

1720232212_324_13_56_81.wav	1505K
1720233004_324_12_198_427.wav	1785K
1720285937_324_12_192_350.wav	744K
1720295907_324_12_175_368.wav	656K
1720298734_323_12_180_879.wav	1117K
1720310525_314_13_131_204.wav	1019K
1720319597_324_13_159_984.wav	869K
1720363297_324_13_66_481.wav	1074K
1720364856_324_13_130_12.wav	496K
1720365120_324_12_166_153.wav	1066K
1720374745_324_13_172_279.wav	386K
1720384230_325_13_160_915.wav	378K
1720402629_326_12_188_737.wav	873K
1720406256_326_12_169_285.wav	1058K
1720458955_132_12_173_903.wav	1796K
1720463981_326_12_153_21.wav	1818K
1720465557_316_12_154_858.wav	171K
1720466146_316_12_194_781.wav	1060K
1720468161_316_12_73_247.wav	421K
1720483751_132_13_160_659.wav	468K
1720492403_313_12_223_781.wav	513K
1720547691_316_13_185_94.wav	1576K
1720554329_326_13_212_128.wav	919K
1720570919_313_13_69_264.wav	1080K
1720578133_326_12_187_615.wav	1476K
1720579565_132_13_203_858.wav	156K
1720579749_313_13_203_653.wav	128K
1720632324_326_12_164_374.wav	584K
1720639485_313_13_152_916.wav	632K
1720656111_313_12_139_79.wav	822K
1720664546_132_12_224_70.wav	849K
1720708874_326_12_192_133.wav	826K
1720718827_313_13_184_977.wav	648K
1720729051_313_13_132_281.wav	390K
1720742631_313_12_246_795.wav	990K
1720751802_5000_12_138_594.wav	791K
1720811345_313_12_71_822.wav	539K
1720812960_5000_13_139_557.wav	1226K
1720813662_5000_12_72_320.wav	804K
1720829640_326_12_152_54.wav	953K
1720836006_313_12_161_600.wav	1484K
1720892788_326_12_191_478.wav	437K
1720902169_5000_13_53_208.wav	525K
1720917426_313_12_186_146.wav	789K
1720922805_326_13_56_6.wav	970K
1720924848_313_13_172_567.wav	496K

1720966374_326_13_135_604.wav	851K
1720986888_313_13_152_28.wav	365K
1721006541_313_12_189_540.wav	1064K
1721011051_313_13_131_654.wav	1261K
1721063463_313_13_153_245.wav	222K
1721064888_313_13_59_335.wav	1222K
1721068668_313_13_55_331.wav	679K
1721075060_313_13_203_232.wav	585K
1721088526_313_12_185_96.wav	1365K
1721095658_326_13_203_592.wav	1271K
1721098627_313_12_167_14.wav	433K
1721141223_313_12_167_468.wav	919K
1721162290_132_12_193_25.wav	628K
1721174819_313_13_154_420.wav	1783K
1721176126_326_12_194_641.wav	377K
1721182545_326_12_182_336.wav	371K
1721226088_326_13_132_261.wav	941K
1721243280_316_12_175_276.wav	769K
1721248443_326_13_172_165.wav	908K
AdjMmsEng.dll	1998K
agm_style.css	1K
AudioDjStudio.dll	480K
AudioSoundEditor.dll	404K
AUTORUN.INF	0K
AutorunPro.exe	106K
AxInterop.WMPLib.dll	60K
CrcLib.dll	4K
ICMVCODEC (2).MSI	101K
ICMVCODEC.MSI	101K
ICM_report.xml	593K
Interop.WMPLib.dll	332K
ListviewPrinterCtl.dll	29K
Microsoft.DirectX.DirectSound.dll	174K
PLAYER.exe	735K
PLAYER.resources.dll	40K
SmartProgBar.dll	19K
TrackBar.dll	32K
WaveExCtrl.Net.dll	352K

***Douglas Jail Calls\en-AU***

Name	Size
PLAYER.resources.dll	52K

***Douglas Jail Calls\es-MX***

Name	Size
PLAYER.resources.dll	40K

***Douglas Jail Calls\fr-FR***

Name	Size
PLAYER.resources.dll	40K

***Douglas Videos with Transcription Imposed***

Name	Size
10_24_23 - masturbation video - 6e89b15e-e203-49a7-8dcb-c94071b67a8c.mp4	2309K
10_26_23 - injury video - 4b8db6d4-9eb1-480f-89c2-2655499611e3.mp4	10943K
11_21_23 - masturbation video - 0357259c-d515-4797-aeff-ef6d99945063.mp4	14897K
12_10_23 - masturbation 1 video - acaa329c-76c5-40a8-ad77-cd67c80327d9.mp4	39287K
12_10_23 - masturbation 2 video - f3ea9348-7b53-41eb-b085-cf1acab70215.mp4	15057K
12_10_23 - masturbation 3 video - 1fbb2068-787b-416b-9524-f819624ae3bd.mp4	13543K

Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 13, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the attached Service List in the manner specified.

s/Gregory Schiller  
 Gregory Schiller  
 Assistant United States Attorney

**SERVICE LIST**

United States v. MICHAEL GORDON DOULGAS  
 Case No. 23-CR-80219-CANNON  
 United States District Court  
 Southern District of Florida

<b>Party</b>	<b>Counsel</b>
Plaintiff: United States	Gregory Schiller Assistant United States Attorney 500 S. Australian Ave., Suite 400 West Palm Beach, FL 33401 Email: gregory.schiller@usdoj.gov <b>via Notice of Electronic Filing generated by CM/ECF</b>
Defendant: Eric Raymond Bahre	John D. Kirby, Esq. The Law Office of John D. Kirby 401 West A. Street, Suite 1150 San Diego, CA 92101  John R. Howes, Esq. Howes Law Group, P.A. 110 SE 6 <sup>th</sup> St., Suite 1700 Ft. Lauderdale, FL 33301 Email: FloridaLawyer@outlook.com <b>via Notice of Electronic Filing generated by CM/ECF</b>